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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No.: 2:21-CR-00311-JAD-VCF
vs.)	
)	STIPULATION TO CONTINUE
ARLETTE ALEXIA MORENO,)	SENTENCING DATE
)	
)	(SECOND REQUEST)
Defendant.)	
)	

Certification: This stipulation is filed pursuant to General Order 2007-04.

IT IS HEREBY STIPULATED AND AGREED, by and between JASON M. FRIERSON United States Attorney, through PATRICK BURNS, and SARAH A. KIEWLICZ, Trial Attorneys, Department of Justice-Tax Division, and Gabriel L. Grasso, Esq, counsel for ARLETTE ALEXIA MORENO (MORENO), that the sentencing hearing currently scheduled for October 4, 2022, at 11:00 am., be vacated and continued to a date and time convenient to this court, but no event earlier than THIRTY (30) days.

Pursuant to General Order No. 2007-04, this stipulation is entered and based upon the following:

1. MORENO is on pretrial release, employed full time, and does not oppose this continuance.
2. The parties agree to the continuance.
3. Defense counsel learned he will have to be out of the jurisdiction on a family matter the week of October 2nd, 2022.
4. The parties have conferred on new dates and both Washington D.C. based Trial Attorneys Patrick Burns and Sarah Kiewlicz will be present in Las Vegas on other matters

1 (U.S. Vs Melvin Orellana case no: 2:22-cr-00084-APG-BNW & U.S. vs King Isaac Umoren
2 Case no: 2:16-cr-00374-APG/2:19-cr-00064-APG-NJK) between 9/19 and 9/23 2022 as
3 well as between 10/31 and 11/4 2022.

4 5. The parties request this sentencing be reset sometime during the above listed range
5 of dates when all parties will be present and available to appear at sentencing.

6 6. Denial of this request for continuance would deny the defense sufficient time to be
7 able to assist in defendant's sentencing and file a Sentencing Memorandum with the court.

8 7. This is the second request for a continuance and or reset of the sentencing date in
9 this case.

10 DATED this 18th day of August, 2022.

11 RESPECTFULLY SUBMITTED BY:

12
13 /s/ Patrick Burns
14 PATRICK BURNS
15 Trial Attorney- Tax Division

/s/ Gabriel L. Grasso
GABRIEL L. GRASSO
Attorney for MORENO

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17 /s/ Sarah A. Kiewlicz
18 SARAH A. KIEWLICZ
19 Trial Attorney -Tax Division
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STIPULATION TO CONTINUE
SENTENCING DATE

(SECOND REQUEST)

FINDINGS OF FACT

Based upon the submitted Stipulation, and good cause appearing therefore, the Court finds that:

1. Defense counsel learned he will have to be out of the jurisdiction on a family matter the week of October 2nd, 2022.
2. MORENO is on pretrial release and does not oppose to the continuance.
3. The parties agree to the continuance.

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CONCLUSIONS OF LAW

Denial of this request for continuance would result in a miscarriage of justice.

ORDER

IT IS ORDERED that the sentencing hearing currently scheduled for October 4, 2022, at 11:00 a.m., be vacated and continued to October 31, 2022, at 10:00 a.m.

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: 8/25/2022